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19 *and additional counsel listed on pleadings*

20 Attorneys for plaintiffs Timothy Scott  
21 Campbell et al.

22 UNITED STATES DISTRICT COURT

23 NORTHERN DISTRICT OF CALIFORNIA

24 TIMOTHY SCOTT  
25 CAMPBELL, et al.,

26 Plaintiffs,

27 vs.

28 CITY OF OAKLAND, et al.

Defendants.

No. CV11-05498 RS

**STIPULATED REQUEST FOR AN ORDER  
EXTENDING DATE FOR AMENDMENT OF  
PLEADINGS, DECLARATION AND  
PROPOSED ORDER**

Complaint Filed: Nov. 14, 2011

Trial Date: May 28, 2013

24 Whereas, this court set a deadline of August 1, 2012, for the parties to complete all  
25 amendments to the pleadings;

26 STIP REQU FOR ORDER EXTENDING DATE FOR AMENDMT OF PLEADINGS  
27 CAMPBELL, ET AL. V. CITY OF OAKLAND, CASE NO. CV11-05498 RS

1 Whereas all current parties agree that it would be most efficient to join all parties  
2 in one action, and additional time is needed to do so as more fully set forth in the attached  
3 declaration of plaintiffs' counsel;

4 THEREFORE, the parties through their respective counsel jointly request that the  
5 court extend the date for amendment of pleadings to October 1, 2012.

6 It is so stipulated.

7 Dated: July 24, 2012 /S/

8 Rachel Lederman  
9 Attorneys for plaintiffs Scott Campbell, et al.

10 /S/

11 Linda Lye  
12 Attorneys for plaintiffs ACLU-NC, et al.

13 /S/

14 William Simmons, Supervising City Attorney  
15 Attorney for defendants

16 **SIGNATURE ATTESTATION**

17 I am the ECF User whose ID and Password are being used to file  
18 this stipulated request. In compliance with General Order 45, X.B., I hereby attest that  
19 Ms. Lye and Mr. Simmons have concurred in this filing.

20 Dated: July 24, 2012 /S/  
21 Rachel Lederman

22  
23  
24  
25  
26 STIP REQ FOR ORDER EXTENDING DATE FOR AMENDMT OF PLEADINGS  
27 CAMPBELL, ET AL. V. CITY OF OAKLAND, CASE NO. CV11-05498 RS  
28

## DECLARATION OF RACHEL LEDERMAN

I am an attorney admitted to practice before this court and the attorney of record for plaintiffs Timothy Scott Campbell, Mark McKinnie, and Michael Siegel.

Plaintiffs' counsel represent approximately fifteen people who were injured during the two demonstrations at issue in this case, which occurred on October 25 and November 2, 2011. Because this matter was originally filed only two weeks after these events, in conjunction with an application for a Temporary Restraining Order, all plaintiffs and defendants were not named at that time. Each of the two events at issue involved a mutual aid operation by a large number of law enforcement agencies in addition to the Oakland Police Department

Counsel for the plaintiffs and counsel for the City of Oakland have been discussing the possibility of engaging in an early settlement process prior to the amendment of pleadings in an attempt to minimize expenses and obviate the need to bring in multiple additional government entity defendants. The case is currently scheduled for a settlement conference with Magistrate Judge Beeler on September 18, 2012. The parties therefore at this time request an extension of the deadline for amendment of pleadings until October 1, 2012.

I declare under penalty of perjury that the foregoing is true and correct. Executed this July 24, 2012, at San Francisco, California.

/S/  
Rachel Lederman

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## [PROPOSED] ORDER

Pursuant to stipulation, the court sets the following deadline for completion of amendment of pleadings: October 1, 2012.

Dated: 7/25/12

  
RICHARD SEEBORG  
United States District Judge

STIP REQU FOR ORDER EXTENDING DATE FOR AMENDMT OF PLEADINGS  
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